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Attorneys for Defendants  
PRIME NOW LLC and AMAZON.COM  
SERVICES LLC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

SHEILA ROWELA CAFE, an individual,

Plaintiff,

v.

PRIME NOW LLC, a limited liability company;  
AMAZON.COM SERVICES, LLC, a limited  
liability company; and DOES 1 through 20,  
inclusive,

Defendants.

Case No. 2:23-cv-02867-TLN-KJN

**JOINT STIPULATION TO MODIFY  
SCHEDULING ORDER; ORDER**

Trial Date: Not Yet Set  
Complaint Filed: October 30, 2023

1 Plaintiff SHEILA ROWELA CAFE (“Plaintiff”) and Defendants PRIME NOW LLC and  
2 AMAZON.COM SERVICES LLC (“Defendants”) (collectively Plaintiff and Defendants are referred  
3 to herein as the “Parties”), by and through their respective counsel of record, hereby stipulate to  
4 continue the deadlines set by the Initial Pretrial Scheduling Order (ECF Dkt. 3).

5 WHEREAS, Plaintiff filed the operative Complaint on **October 30, 2023**, in the  
6 Superior Court of California, County of Sacramento;

7 WHEREAS, Defendants removed this matter to the United States District Court,  
8 Eastern District of California on **December 7, 2023**;

9 WHEREAS, on **December 8, 2023**, the Court issued an Initial Pretrial Scheduling  
10 Order that set forth the following litigation dates:

- 11 - Non-expert discovery completion date – **August 5, 2024** (240 days after removal);
- 12 - Expert witness disclosure deadline – **October 4, 2024** (60 days after close of  
13 discovery);
- 14 - Supplemental expert witness disclosure deadline – **November 4, 2024** (30 days after  
15 initial expert witness disclosures);
- 16 - Supplemental discovery completion date – **January 2, 2025** (30 days prior to the  
17 dispositive motion deadline); and
- 18 - Dispositive motion deadline – **February 1, 2025** (180 days after close of discovery);

19 WHEREAS, the Parties have agreed to participate in a private mediation currently  
20 scheduled to be held on **August 19, 2024**, and the Parties seek to stay litigation activities in order to  
21 focus their efforts on potential resolution of this matter;

22 WHEREAS, the Parties respectfully request that the Court modify the Initial Pretrial  
23 Scheduling Order and reset the litigation dates as follows (or other dates as the Court sees fit);

- 24 - Non-expert discovery completion date – **November 19, 2024**;
- 25 - Expert witness disclosure deadline – **January 17, 2025**;
- 26 - Supplemental expert witness disclosure deadline – **February 17, 2025**;
- 27 - Supplemental discovery completion date – **April 18, 2025**; and
- 28 - Dispositive motion deadline – **May 19, 2025**.

1  
2 Dated: May 10, 2024

LAW OFFICES OF RAMIN R. YOUNESSI, APC

3  
4 /s/ Chris S. Afgani (as authorized on 5/9/24)

Ramin R. Younessi

Samantha L. Ortiz

5 Christopher S. Afgani

6 Attorneys for Plaintiff

7 SHEILA ROWELA CAFE

8  
9 Dated: May 10, 2024

LITTLER MENDELSON, P.C.

10  
11 /s/ Douglas L. Ropel

Britney N. Torres

12 Douglas L. Ropel

13 Attorneys for Defendants

PRIME NOW LLC and AMAZON.COM

14 SERVICES LLC

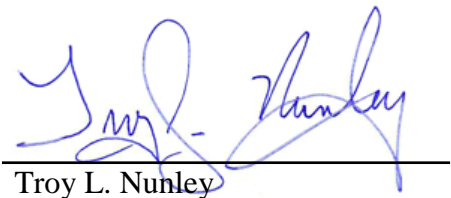
15 **ORDER**

16 AS STIPULATED, the Pretrial Scheduling Order is modified as follows:

- 17 - Non-expert discovery completion date – **November 19, 2024;**  
18 - Expert witness disclosure deadline – **January 17, 2025;**  
19 - Supplemental expert witness disclosure deadline – **February 18, 2025;**  
20 - Supplemental discovery completion date – **April 18, 2025;** and  
21 - Dispositive motion deadline – **May 19, 2025.**

22 IT IS SO ORDERED.

23  
24 DATED: May 10, 2024

25 

26 Troy L. Nunley  
27 United States District Judge  
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